

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
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JULIO SANTIAGO, et al.                    )

CRIMINAL NO.: 04-10336-NMG

**UNITED STATES' SUPPLEMENTAL LIST OF POTENTIAL EXHIBITS**

The United States of America, Michael J. Sullivan, United States Attorney for the District of Massachusetts, William F. Bloomer, Assistant U.S. Attorney, hereby submits the following supplement to its list of potential exhibits for trial in the above-referenced matter.<sup>1</sup>

- 327. Photographs of 212 Wilder Street, Lowell MA, and items seized on October 15, 2004
- 328. Photographs of Julio Santiago and Jose Torrado at 212 Wilder Street, Lowell MA, on August 27, 2004
- 329. Photographs of 264 Mechanic Street, Leominster, MA, and items seized on October 15, 2004
- 330. Photographs of 270 Fairmont Street, Fitchburg, MA, and items seized on October 15, 2004
- 331. Photographs of 930 59<sup>th</sup> Street, Brooklyn, NY, and surrounding area
- 332. Photographs of 235 18<sup>th</sup> Street, Dracut, MA, and items seized on October 15, 2004
- 333. Photographs of Mini Self Storage, 3 Foundry Street, Lowell, MA, and items seized on October 15, 2004
- 334. Signed Miranda Rights Card, Carlos Sanchez, dated 10/15/04

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<sup>1</sup>With the exception of one item - the Summary Chart for the GPS pertaining to Santiago's van - the defense has been provided copies of the documentary evidence well in advance of the filing of this supplemental notice.

- 335. Signed Consent to Search Form, Carlos Sanchez, dated 10/15/04
- 336. Signed Consent to Search Form, Paola Frey, dated 10/15/04
- 337. Signed Consent to Search Form, Janice Perez, dated 10/15/04
- 338. Summary Chart of Global Positioning System history for Santiago minivan and trips to NY and 270 Fairmont Street
- 339. Signed Consent to Search Form, Zuleima Reyes, dated 10/15/04
- 340. Plastic bag containing 19.54 grams of heroin seized from 11 Payne Street on 9/28/02
- 341. Department of Public Health Certificate of Analysis concerning 19.54 grams of heroin
- 342. Transcript of Recorded Conversation Between Rivera/Santiago 7/1/04 1:18 PM
- 343. Transcript of Recorded Conversation Between Miranda /Santiago 9/2/04 6:55PM
- 344. Transcript of Recorded Conversation Between Miranda /Santiago 10/13/04 8:23 PM

This supplemental list does not include exhibits that the United States may determine are necessary for rebuttal. Physical evidence, which is not capable of reproduction, is available for inspection. By providing a Supplemental List of Potential Exhibits, the government is not representing that it necessarily intends to introduce into evidence at trial each item listed above. The United States reserves its right to amend its exhibit list before the commencement of trial. The United States will notify counsel immediately if any such additions or amendments are made.

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ William F. Bloomer  
WILLIAM F. BLOOMER  
Assistant U.S. Attorney

**CERTIFICATE OF SERVICE**

I, William F. Bloomer, hereby certify that this document filed through the ECF system on October 13, 2006, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non registered participants this date via US Postal Service, postage prepaid.

/s/William F. Bloomer  
WILLIAM F. BLOOMER

Date: 13 October 2006